

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

PC CONNECTION, INC.,

Plaintiff,

v.

STEPHEN P. PRICE,

Defendant.

No. 1:15-cv-000208-PB

**ASSENTED-TO MOTION FOR PLAINTIFF'S PRO HAC
VICE COUNSEL TO APPEAR WITHOUT LOCAL
COUNSEL AT HEARING ON MOTION TO DISMISS**

NOW COMES the Plaintiff, PC Connection, Inc. ("PC Connection"), by and through its attorneys, Jackson Lewis, P.C., and files this Assented-To Motion for Plaintiff's *Pro Hac Vice* Counsel to Appear without Local Counsel at Hearing on Motion to Dismiss. In support of this motion, PC Connection states as follows:

1. PC Connection filed an Amended Complaint to, among other claims, enforce an Employee Agreement between the parties. Defendant moved to dismiss PC Connection's Amended Complaint based on Fed. R. Civ. Pr. 12(b)(1) and (6).

2. The Court scheduled a hearing for October 19, 2015 at 2:30 pm on the pending Motion to Dismiss.

3. On the way to the hearing, Erik Winton, lead counsel for PC Connection and admitted to the Court in this case *pro hac vice*, was in an automobile accident which resulted in the continuance of the scheduled hearing.

4. The Court has rescheduled the hearing for Friday, October 23, 2015 at 2 pm.

5. Attorney Winton is available for the hearing, but Attorney Joshua Scott, local counsel for Plaintiff, is not available due to a previously scheduled mediation on the same date.

6. In order to expedite the rescheduling of the hearing on the pending Motion to Dismiss, PC Connection requests that the Court allow Attorney Winton to appear without local counsel present.

7. All parties assent to the relief sought by this motion.

WHEREFORE, Plaintiff respectfully requests that this honorable Court:

A. Grant this Motion; and

B. Grant such other and further relief as this Court deems just and proper.

CONCURRENCE STATEMENT, LR 7.1(c)

Attorney Lisa Hall, counsel for the Defendant, has been contacted and concurs to the relief sought in this motion.

MEMO STATEMENT, LR 7.1(a)(2)

No Memorandum of Law accompanies this motion due to the discretionary nature of the relief requested herein.

Dated: October 20, 2015

Respectfully submitted,

PC CONNECTION, INC
By its attorneys,

/s/ K. Joshua Scott
K. Joshua Scott (NH Bar No. 17479)
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Certificate of Service

I hereby certify that the foregoing was served by ECF on counsel for defendant, Lisa A. Hall, Esq. and Charles W. Grau, Esq.

Date: October 20, 2015

/s/ K. Joshua Scott
K. Joshua Scott, NHBA# 17479

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